

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

NEIL FALLON, JEAN-PAUL GASTER, DAN  
MAINES and RICHARD SULT, individually and  
collectively p/k/a CLUTCH

Plaintiffs,

vs.

DRT ENTERTAINMENT, INC., and DEREK  
SCHULMAN

Defendants.

Civil Action No. 08-CIV-4452

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local rules of the United States District Courts for the  
Southern and Eastern District of New York, I, STEPHANIE FURGANG ADWAR, a member  
in good standing of the bar of this court, hereby move for an Order allowing the admission pro  
hac vice of

Applicant's Name: TIMOTHY C. MATSON

Firm Name: LOMMEN ABDO COLE KING & STAGEBERG, P.A.

Address: 80 South Eighth Street  
Suite 2000  
Minneapolis, MN 55402

Phone Number: 612-339-8131

Fax: 612-339-8064

TIMOTHY C. MATSON, a member in good standing of the Bar of the States of

There are no pending disciplinary proceeding against TIMOTHY C. MATSON in any State or  
Federal court.

Dated: June 17, 2008

JUN 20 2008

KL 925-6546044

FILED  
JUN 20 2008  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

City, State: New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Furgang', is written over a horizontal line.

STEPHANIE FURGANG ADWAR (SA-1711)

FURGANG & ADWAR, L.L.P.

1325 Avenue of the Americas, 28<sup>th</sup> Floor

New York, NY 10019

Telephone: (212) 725-1818

Fax: (212) 941-9711

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Civil Action No.08- CIV-4452

**AFFIRMATION OF STEPHANIE  
FURGANG ADWAR IN  
SUPPORT OF MOTION  
TO ADMIT TIMOTHY C.  
MATSON, PRO HAC VICE**

I, Stephanie Furgang Adwar, do affirm that:

1. I am local counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Timothy C. Matson as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on August 12, 1991. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this court.
3. I have known Mr. Matson since October of 2003.
4. Mr. Matson is a partner at Lommen Abdo Cole King Stageberg, P.A., in Minneapolis, Minnesota.
5. I have found Mr. Matson to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Timothy C. Matson, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Timothy C. Matson, pro hac

vice which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Timothy C. Matson, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: June , 2008  
City, State: West Nyack, NY

Respectfully submitted,  
FURGANG & ADWAR, L.L.P.



BY: STEPHANIE FURGANG ADWAR (SA-1741)

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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Plaintiffs,

vs.

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SCHULMAN

Defendants.

Civil Action No.08- CIV-4452

**DECLARATION OF TIMOTHY  
CART MATSON IN SUPPORT  
OF MOTION FOR ADMISSION  
PRO HAC VICE**

I, Timothy Cart Matson, do affirm that:

1. I am a shareholder of the Minneapolis law firm Lommen, Abdo, Cole, King & Stageberg, P.A. and counsel for Plaintiff in the above captioned action. I make this declaration in support of Plaintiff's motion to admit me as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of Minnesota. I was admitted to practice law before all Minnesota state courts on May 8, 1992 and before the United States District Court for the District of Minnesota on August 18, 1993.
3. There are no pending disciplinary proceeding against me in any State or Federal court.
4. I respectfully request that the Court issue an order granting my admission to appear pro hac vice in the above-encaptioned matter.

Dated: June 12, 2008

Respectfully submitted,  
LOMMEN ABDO COLE KING & STAGEBERG P.A..

BY: Timothy C. Matson (Minn. Atty. I.D. No. 225423)

# STATE OF MINNESOTA IN SUPREME COURT

## *Certificate of Good Standing*

This is to certify that the following lawyer is in good standing.

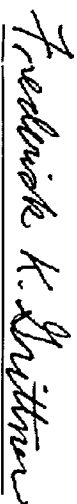
TIMOTHY CART MATSON

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

May 08, 1992

Given under my hand and seal of this court on

June 16, 2008



Fredrick K. Gritner

Clerk of Appellate Courts



UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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NEIL FALLON, JEAN-PAUL GASTER, DAN  
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**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN NOTICE**

Upon the motion of STEPHANIE FURGANG ADWAR, attorney for Plaintiffs Neil Fallon, Jean-Paul Gaster, Dan Maines and Richard Sult, individually and collectively p/k/a Clutch and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: TIMOTHY C. MATSON

Firm Name: LOMMEN ABDO COLE KING & STAGEBERG, P.A.

Address: 80 South Eighth Street  
Suite 2000  
Minneapolis, MN 55402

Phone Number: 612-339-8131

Fax: 612-339-8064

Email Address: Tim@lommen.com

is admitted to practice pro hac vice as counsel for Plaintiffs in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing

discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF passwork at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

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United States District/Magistrate Judge



**Certificate of Service**

I certify that the Motion to Admit Timothy C. Matson, Esq., Pro Hac Vice, along with all supporting documents and affirmations, was served upon Defendants' attorney Tab K. Rosenfeld, Esq., by depositing same in the United States mail, first-class, postage prepaid, in an envelope addressed to said attorney at Rosenfeld & Kaplan, LLP, 535 Fifth Avenue, Suite 1006, New York, NY 10017 which address is last known to me.



STEPHANIE FURGANG ADWAR (SA-1711)

Dated: June 17, 2008